| 1  | DAYLE ELIESON   |  |  |
|----|---|--|--|
| 2  | United States Attorney  |  |  |
| 2  | District of Nevada  |  |  |
| 3  | ELIZABETH FIRER   |  |  |
| 4  | Special Assistant United States Attorney 160 Spear Street, Suite 800                                  |  |  |
| 4  | San Francisco, CA 94105   |  |  |
| 5  | Phone: 415-977-8937   |  |  |
| 6  | Email: Elizabeth.Firer@ssa.gov  |  |  |
| 7  | Attorneys for Defendant   |  |  |
| 8  | UNITED STATES DISTRICT COURT  |  |  |
| 9  | DISTRICT OF NEVADA (LAS VEGAS)  |  |  |
| 10 | WILLIAM J. FROBY,   | )  |  |
| 11 | Plaintiff,  | ) Case No. 2:18-cv-00641-JAD-CWH                     |  |
| 12 | Traintiff,  | )  |  |
|    | v.  | ) UNOPPOSED MOTION FOR<br>EXTENSION OF TIME          |  |
| 13 | NANCY BERRYHILL,  | ) EXTENSION OF TIME<br>) (FIRST REQUEST)             |  |
| 14 | Acting Commissioner of Social Security,   |  |  |
| 15 | Defendant.  | )  |  |
| 15 |   |  |  |
| 16 |   |  |  |
| 17 | Defendant Nancy Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully          |  |  |
| 18 | requests for the first time that the Court extend the time for Defendant to file her Cross-Motion for |  |  |
| 19 | Summary Judgment and Memorandum in Support, due on November 8, 2018, by 30 days, through and          |  |  |
| 20 | including December 10, 2018.  |  |  |
| 21 | An extension of time is needed in order to prepare Defendant's brief because of the caseload of       |  |  |
| 22 | Defendant's attorneys. This request is made in good faith with no intention to unduly delay the       |  |  |
| 23 | proceedings.  |  |  |
| 24 | Counsel for Defendant conferred with  | Plaintiff's counsel on October 31, 2018. Plaintiff's |  |

counsel does not oppose this motion.

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| 1  | Respectfully submitted this 31st day of October 2018. |   |
|----|---|---|
| 2  |   | DAYLE ELIESON                                     |
| 3  |   | United States Attorney                            |
| 4  |   | /s/ Elizabeth Firer<br>ELIZABETH FIRER            |
| 5  |   | Special Assistant United States Attorney          |
| 6  |   |   |
| 7  | S. WYETH McADAM                                       |   |
| 8  | Of Counsel  |   |
| 9  |   | IT IS SO ORDERED:                                 |
| 10 |   | Const   |
| 11 |   | CARL W. HOFFMAN<br>UNITED STATES MAGISTRATE JUDGE |
| 12 |   | CIVILD STATES WAGISTRATE JODGE                    |
| 13 |   | DATED: November 1, 2018                           |
| 14 |   | DATED   |
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